

April 21, 2017

Ms. Marlene H. Dortch  
Secretary  
U.S. Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**RE: VEHICLE-TO-VEHICLE COMMUNICATIONS**

Dear Ms. Dortch:

On behalf of the Ford Motor Company (Ford), this *ex parte* notice memorializes a meeting between representatives of Ford and staff representing the office of Chairman Ajit Pai. On Thursday, April 20, 2017, Mr. Andre Welch, Manager of Advanced Safety Rulemakings and Policy, Mr. Nicholas Baracos, Principle Research Engineer, Dr. Michael Shulman, Technical Leader, and Mr. Andrew Woelfling, Director of Smart Mobility, met with Mr. Nicholas Degani, Senior Counsel to Chairman Pai. The purpose of the meeting was to discuss Ford's comments in response to the National Highway Traffic Safety Administration (NHTSA) Vehicle-to-Vehicle (V2V) Notice of Proposed Rulemaking (NPRM).

Mr. Welch gave Mr. Degani an oral summary of issues addressed in Ford's comments in response to the NHTSA NPRM, including the company's support for modifying the proposed phase-in time for implementation of V2V technology, the adoption of Society of Automotive Engineers (SAE) standards for the purposes of V2V performance criteria, and the importance of ensuring no harmful interference in the 5.9 GHz band. Mr. Welch also described Ford's intention to commence field tests of cellular V2V technology.

Mr. Degani inquired of the Ford representatives whether the company would deploy DSRC-based V2V technology absent a mandate from the federal government. Dr. Shulman stated that Ford has made no public commitment to that effect but also that the company would comply with any related federal mandate. He further suggested it would be instructive to consider the case of Europe, where V2V deployment without a government mandate has not yet achieved critical mass. Dr. Shulman also described related domestic research into V2V and Vehicle-to-Infrastructure (V2I) applications done in cooperation between private industry and the federal government.

Mr. Degani inquired further of Ford's representatives whether the company supports or opposes the "re-channelization" proposal described in comments in response to ET Proceeding 13-49. Mr. Woelfling responded that Ford supports the "detect-and-avoid" concept, as described in its July 7, 2016, comments filed in response to that proceeding.

Mr. Degani went on to ask whether the 802.11 standard, the basis for Dedicated Short Range Communications (DSRC), is appropriate for safety-of-life applications. In response, Dr. Shulman described industry standards which developed a congestion management algorithm that provides priority to DSRC transmissions. Mr. Degani also asked whether Ford had tested DSRC in high-congestion situations, to which Dr. Shulman responded affirmatively.

Mr. Degani went on to ask what need there is for the entire 5.9 GHz band for V2V applications, noting that the Basic Safety Message is carried on a single, 10-Megahertz band (Channel 172). Dr. Shulman noted that industry focus to date has been on Channel 172 but that other, less mature work was underway to explore applications using other channels.

Finally, Mr. Degani inquired whether Ford would support re-channelization of the 5.9 GHz band if testing indicated interference with such band from UNII-3 devices. Dr. Shulman responded that he is aware of such concerns, but the issue would require further study. Mr. Woelfling reiterated the offer made by Ford in its July 7, 2016, comments to assist the Commission in validating spectrum sharing concepts.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Andre Welch", with a stylized, cursive script.

Andre Welch